

# Executive Branch Personnel

## Public Financial Disclosure Report (OGE Form 278e)

### Filer's Information

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**Renna, Stephen**

Director, Advocacy Center, Department of Commerce

Date of Appointment: 09/05/2017

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Other Federal Government Positions Held During the Preceding 12 Months:

None

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Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

**/s/ Renna, Stephen [electronically signed on 09/17/2017 by Renna, Stephen in Integrity.gov]**

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Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

**/s/ Jacob, Dana, Certifying Official [electronically signed on 11/29/2017 by Jacob, Dana in Integrity.gov]**

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Other review conducted by

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U.S. Office of Government Ethics Certification

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Data Revised 11/29/2017

Data Revised 11/28/2017

Data Revised 11/22/2017

Data Revised 11/20/2017

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## 1. Filer's Positions Held Outside United States Government

None

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## 2. Filer's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Fidelity Fund Cash Reserves	Yes	\$15,001 - \$50,000		None (or less than \$201)
2	MORGAN STANLEY FIN LLC MTN	Yes	\$15,001 - \$50,000		None (or less than \$201)
3	361 GLOBAL MANAGED FUTURES INV CL	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
4	361 MANAGED FUTURES FUND INVESTOR CLASS	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
5	ARTISAN HIGH INCOME FUND INVESTOR	Yes	\$50,001 - \$100,000		\$5,001 - \$15,000
6	BOSTON PARTNERS GLOBL LONG SHRT INSL	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
7	BOSTON PARTNERS LONG SHORT RESEARCH INVS	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
8	DRIEHAUS EMERGING MARKETS SM CAP GRWTH	Yes	\$15,001 - \$50,000		None (or less than \$201)
9	DREYFUS GLOBAL REAL RETURN CLASS A	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
10	EATON VANCE ATLANTA CAP SMID CAP FD A	Yes	\$50,001 - \$100,000		\$15,001 - \$50,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
11	GUGGENHEIM TOTAL RETURN BOND A	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
12	GOTHAM INDEX PLUS FUND INSTL	Yes	\$50,001 - \$100,000		\$2,501 - \$5,000
13	LORD ABBETT SHORT DURATION INCOME CL A	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
14	LORD ABBETT INFLTN FOCUSED CL A	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
15	LJM PRESERVATION AND GROWTH FUND CLASS I	Yes	\$15,001 - \$50,000		\$201 - \$1,000
16	OSHAUGHNESSY SMALL CAP VALUE FUND CL	Yes	\$15,001 - \$50,000		\$5,001 - \$15,000
17	POLEN GROWTH FUND INSTL SHARES	Yes	\$50,001 - \$100,000		\$5,001 - \$15,000
18	T ROWE PRICE CAP APPRECIATION	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
19	FIRST EAGLE GLOBAL CLASS A	Yes	\$50,001 - \$100,000		\$15,001 - \$50,000
20	TORTOISE ENERGY INFRA CORP COM	Yes	\$15,001 - \$50,000		None (or less than \$201)
21	WCM FOCUSED INTL GROWTH FUND INVESTOR	Yes	\$100,001 - \$250,000		\$15,001 - \$50,000

### 3. Filer's Employment Agreements and Arrangements

None

#### 4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Commercial Real Estate Finance Council	Washington, District of Columbia	President & CEO of a trade association.

#### 5. Spouse's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	The Business Council (Business association for CEOs of major companies )	N/A		salary	
2	Ivy Science and Technology R	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
3	Fidelity Advisors Real Estate M	Yes	\$15,001 - \$50,000		\$201 - \$1,000
4	American Funds Euro Growth R1Pac	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
5	JP MOrgan Midcap Growth R2	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
6	MM S&P 500 Index R3	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
7	Blackrock Total Return R	Yes	\$15,001 - \$50,000		\$201 - \$1,000
8	Premium barings High Yield R3	Yes	\$15,001 - \$50,000		\$201 - \$1,000
9	FIDELITY GOVERNMENT CASH RESERVES	Yes	\$1,001 - \$15,000		None (or less than \$201)
10	361 GLOBAL LONG SHORT EQUITY FD CL I	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
11	ARTISAN GLOBAL EQUITY FUND INVESTOR	Yes	\$50,001 - \$100,000		\$15,001 - \$50,000
12	FIRST TR EXCHANGE TRADED FD DOW JONES INTERNET INDEX FD	Yes	\$1,001 - \$15,000		\$5,001 - \$15,000
13	FIRST TR EXCHANGE TRADED FD II CONSUMER DISCRETIONARY ISIN #	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
14	FIRST TR EXCHANGE TRADED FD II CONSUMER STAPLES ALPHADEX FD	Yes	\$1,001 - \$15,000		\$201 - \$1,000
15	FIRST TR EXCHANGE TRADED FD II UTILS ALPHADEX FD ANNUAL	Yes	\$1,001 - \$15,000		\$201 - \$1,000
16	FIRST TR EXCHANGE TRADED FD II MATERIALS ALPHADEX FD USD ISI	Yes	\$1,001 - \$15,000		\$201 - \$1,000
17	ISHARES TR US HOME CONS ETF	Yes	\$1,001 - \$15,000		\$2,501 - \$5,000
18	ISHARES US TECHNOLOGY ETF	Yes	\$1,001 - \$15,000		\$2,501 - \$5,000
19	SPDR SER TR S&P BK ETF	Yes	\$1,001 - \$15,000		\$201 - \$1,000
20	SPDR SER TR S&P INS ETF	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
21	SPDR SER TR S&P REGL BKG ETF	Yes	\$1,001 - \$15,000		\$2,501 - \$5,000
22	T ROWE PRICE CAP APPRECIATION	Yes	\$50,001 - \$100,000		\$15,001 - \$50,000
23	FIRST EAGLE OVERSEAS CLASS I	Yes	\$50,001 - \$100,000		\$201 - \$1,000
24	SPDR SERIES TRUST S&P AEROSPACE & DEFENSE ETF	Yes	\$1,001 - \$15,000		\$2,501 - \$5,000
25	SPDR SER TR S&P BIOTECH ETF	Yes	\$1,001 - \$15,000		\$201 - \$1,000
26	SPDR S&P HEALTH CARE EQUIPME	Yes	\$1,001 - \$15,000		\$2,501 - \$5,000
27	SELECT SECTOR SPDR TR HEALTH CARE FORMERLY CONSUMER SVCS TO	Yes	\$1,001 - \$15,000		\$2,501 - \$5,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
28	SPDR SERIES TRUST NYSE TECHNOLOGY ETF	Yes	\$1,001 - \$15,000		\$5,001 - \$15,000
29	SPDR SER TR S&P SEMICONDUCTOR ETF	Yes	\$1,001 - \$15,000		\$5,001 - \$15,000
30	SPDR S&P SOFTWARE &SER ETF	Yes	\$1,001 - \$15,000		\$2,501 - \$5,000

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Fidelity FDIC Bank Deposit Sweep Not Covered by SIPC	Yes	\$50,001 - \$100,000		None (or less than \$201)
2	INFINITY CORE ALTERNATIVE FD	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
3	Harmony Partners Fund II	Yes	\$100,001 - \$250,000		None (or less than \$201)
4	Virtus Real Estate Capital Class B	Yes	\$50,001 - \$100,000		None (or less than \$201)
5	Virtus Real Estate Capital Class A	Yes	\$50,001 - \$100,000		None (or less than \$201)
6	361 GLOBAL MANAGED FUTURES INV CL (	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
7	361 MANAGED FUTURES FUND INVESTOR CLASS	Yes	\$15,001 - \$50,000		None (or less than \$201)
8	EATON VANCE MUNICIPL OPPORTUNITIES CL I	Yes	\$15,001 - \$50,000		None (or less than \$201)
9	LORD ABBETT INTERMED TAX FREE FD CLASS A	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
10	LJM PRESERVATION AND GROWTH FUND CLASS I	Yes	\$15,001 - \$50,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
11	Bank of America Money Market	No	\$1,001 - \$15,000	Interest	None (or less than \$201)
12	Bank of America Checking Account	No	\$1,001 - \$15,000	Interest	None (or less than \$201)
13	Congressional Federal Credit Union	No	\$1,001 - \$15,000	Interest	None (or less than \$201)
14	Congressional Federal Credit Union Checking Acct	No	\$1,001 - \$15,000	Interest	None (or less than \$201)

## 7. Transactions

(N/A) - Not required for this type of report

## 8. Liabilities

None

## 9. Gifts and Travel Reimbursements

(N/A) - Not required for this type of report

## Endnotes



# Summary of Contents

## 1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation.

This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

## 2. Filer's Employment Assets & Income and Retirement Accounts

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

## 3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

#### **4. Filer's Sources of Compensation Exceeding \$5,000 in a Year**

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period.

The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

#### **5. Spouse's Employment Assets & Income and Retirement Accounts**

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

#### **6. Other Assets and Income**

Part 6 discloses each asset, not already reported, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children.

This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 of income was produced). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

#### **7. Transactions**

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during reporting period.

This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

## **8. Liabilities**

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period.

This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (limitations apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

## **9. Gifts and Travel Reimbursements**

This section discloses:

- Gifts totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$156 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

## Privacy Act Statement

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another; (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

## Public Burden Information

This collection of information is estimated to take an average of three hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, NW., Washington, DC 20005-3917.

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